SEALED DOCUMENT

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

FILED - USDC-NH 2021 MAR 15 PH1:50

UNITED STATES OF AMERICA)	
)	
V.)	No. 1:21-cr-
)	
IAN FREEMAN, ET AL.)	

MOTION TO SEAL AT LEVEL II: INDICTMENT, ARREST WARRANTS, THIS MOTION, & DOCKET TEXT ENTRIES

The United States of America respectfully moves to seal at Level II the indictment and arrest warrants in this case, this motion, and the corresponding docket text entries until the defendants are taken into custody.

Under Federal Rule of Criminal Procedure 49.1(d) and Local Rule 83.12(a)(1), the Court has authority to grant this motion.

The Court should seal these documents because, based on investigative information, it is unlikely that the defendants are aware that they are the targets of a criminal investigation or that they have been indicted. The premature release of these documents may cause the defendants to destroy evidence, flee to avoid arrest, and make apprehending them more difficult and dangerous than it would be otherwise.

The United States expressly excludes from the scope of this motion the distribution of the arrest warrants to and among law enforcement agencies, including the posting of the arrest warrants to law enforcement databases and indices.

*United States v. Ian Freeman, et al.*Motion To Seal Indictment & Arrest Warrant Page 2 of 2

Respectfully submitted,

JOHN J. FARLEY Acting United States Attorney

Dated: March 15, 2021

By: Georgiana L. MacDonald

Assistant United States Attorney

Motion:

☑ Granted

☐ Denied

United States Magistrate Judge
United States District Court
District of New Hampshire

Date: 3/15/2021